

Exhibit A

In the Matter Of:

HENRY v

BROWN UNIVERSITY

SHAWN FELTON

November 30, 2023



1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF ILLINOIS
3 EASTERN DIVISION
4 Case No. 1:22-cv-00125

5 -----
6 SIA HENRY, et al., individually
7 and on behalf of all others
8 similarly situated,
9 Plaintiffs,

10 v.

11 BROWN UNIVERSITY, et al.,
12 Defendants.
13 -----

14
15 VIDEOTAPED DEPOSITION OF
16 SHAWN FELTON
17 CORNELL UNIVERSITY

18
19 Thursday, November 30, 2023
20 9:06 a.m. (EST)

21 Final transcript without Confidentiality Designations
22

23 Reported by:
24 Joan Ferrara, RMR, FCRR
25 Job No. 2023-915491

November 30, 2023

9:06 a.m. (EST)

Videotaped Deposition of SHAWN

FELTON, CORNELL UNIVERSITY, held remotely

via Zoom, before Joan Ferrara, a Registered

Merit Reporter, Federal Certified Realtime

Reporter and Notary Public.

1 [REDACTED]

2 Do you know who [REDACTED]

3 is?

4 A. I do not.

5 Q. And I guess --

6 MR. DELICH: Norm, do you have
7 the ability to identify the student
8 that the UID stands for here?

9 MR. ARMSTRONG: No, I don't. We
10 didn't get that information in
11 advance, so I don't have it.

12 MR. DELICH: Okay. All right.
13 We can take that one down.

14 BY MR. DELICH:

15 Q. Mr. Felton, do you know an
16 individual named [REDACTED]?

17 A. No.

18 Q. What about [REDACTED] -- and I'm going
19 to do my best on pronunciations here --
20 [REDACTED]?

21 A. No.

22 Q. What about [REDACTED]?

23 A. No.

24 Q. [REDACTED]?

25 A. No.

1 Q. What about [REDACTED]
2 [REDACTED]?

3 A. I'm familiar with [REDACTED]
4 [REDACTED] it's pronounced.

5 Q. [REDACTED]
6 Have you ever met him?

7 A. No.

8 Q. Are you aware that -- looks like
9 their son [REDACTED] was admitted to
10 the class of 2022?

11 A. No.

12 Q. Do you know [REDACTED]
13 [REDACTED]?

14 A. I don't know them, but I'm
15 familiar with the name.

16 Q. And how are you familiar with the
17 name?

18 A. [REDACTED]
19 [REDACTED]
20 [REDACTED]

21 Q. Does that mean they are
22 substantial donors to the university?

23 A. I have no idea.

24 Q. Are you aware that their child
25 [REDACTED] was admitted to the Class of

1 2016?

2 A. No.

3 Q. What about [REDACTED] to the
4 Class of 2018?

5 A. No.

6 Q. And [REDACTED] to the Class
7 of 2020?

8 A. No.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

13 MR. ARMSTRONG: Objection. Form.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

23 Q. Okay.

24 MR. DELICH: I'm going to go

25 ahead and mark as Exhibit 12 the

1

20 minimum requirements for admission to be
21 offered admission regardless of who you
22 are. That is -- that's the bottom line.
23 We have to bring prepared students to the
24 university to sit in the classrooms here.
25 And in some cases, information

160

[REDACTED]

24 MR. DELICH: We can take this one
25 down. So I have -- there's two

[REDACTED]

16 Do you think you're more likely
17 to be committed if you're connected to a
18 donor than a politician?

19 MR. ARMSTRONG: Objection. Form.

20 A. I think you're more likely to be
21 admitted if you present a strong
22 application and you meet the admission
23 requirements for the program/school you've
24 applied to and the particular year that
25 you've applied.